



OFFICE OF THE MAYOR

MAYOR BEN WALSH

October 14, 2021

Mark Frechette, P.E.
Project Director
New York State Department of Transportation, Region 3
333 East Washington Street
Syracuse, NY 13202

Rick Marquis
Division Administrator
Federal Highway Administration
Leo W. O'Brien Federal Building
11A Clinton Avenue, Suite 719
Albany, NY 12207

Dear Director Frechette and Administrator Marquis,

This letter is submitted on behalf of the City of Syracuse (the "City") in order to provide comments regarding the Draft Design Report/Draft Environmental Impact Statement (the "DEIS") prepared by the Federal Highway Administration (FHWA) and the New York State Department of Transportation (hereafter referred to collectively as the "NYSDOT"). I greatly appreciate the thorough process under which NYSDOT and FHWA have considered this project and the community outreach and engagement and public input that has occurred over many years. The Community Grid is the right alternative for Syracuse, Central New York and all of New York State (the "Project"). While there are still elements of the Project that must be improved, that fact remains clear.

Therefore, the purpose of this letter is not to dispute the preferred alternative proposed by the NYSDOT, but rather to request that further mitigation for the adverse environmental impacts associated with the Community Grid alternative be included in the Final Environmental Impact Statement (the "FEIS"). See 40 C.F.R. § 1502.14(f) (requiring an FEIS to include "mitigation measures not already included in the proposed action or alternatives"); 40 C.F.R. § 1502.16(h); (stating that an FEIS must discuss "[m]eans to mitigate adverse environmental impacts"). The FEIS should include a detailed discussion of measures that the NYSDOT shall undertake to mitigate adverse environmental impacts associated with the Community Grid alternative. *Oregon Nat. Res. Council v. Marsh*, 832 F.2d 1489, 1493 (9th Cir. 1987) (citing 40 1502.16(h)), rev'd on other grounds, 490 U.S. 360 (1989). A mere listing of mitigation measures would be insufficient. Rather, an adequate FEIS must discuss the mitigation measures in sufficient detail to reveal their efficacy. *Okanogan Highlands Alliance v. Williams*, 236 F.3d 468 (9th Cir. 2000).

Office of the Mayor
233 E. Washington St.
201 City Hall
Syracuse, N.Y. 13202

Office 315 448 8005
Fax 315 448 8067

www.syr.gov.net

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It is our sincere hope that the feedback provided by this letter will assist the NYSDOT in crafting a better plan to mitigate the impacts identified in the DEIS. Syracuse will benefit from the Community Grid alternative, but only if adequate mitigation measures are provided by the NYSDOT in order to address impacts proceeding from the construction process and certain design elements of the Project.

First, my greatest concern has been and continues to be the people who live closest to the existing I-81 corridor. They have borne the biggest burden in the past, and their neighborhoods must be protected and invested in. I am concerned about the proposed design and position of the roundabout at Martin Luther King School. We cannot allow expediency of transportation to put our children at risk for decades to come. I request that you listen to the public's feedback and suggestions on this critical element of the Project and modify this design element in the FEIS.

Second, I appreciate NYSDOT's inclusion of a Land Use Working Group for surplus land that will become available as a result of the Project. This group must include the City, the school district, neighborhood representatives, environmental justice groups, economic opportunity and development organizations, and other stakeholders. Land use is a priority concern for the City and its residents, so there must be local control of decision making regarding surplus land, and priority must be given to land uses that benefit environmental justice communities.

Finally, I continue to challenge the State to aim high on local hiring. The City and NYSDOT have worked well together in planning to ensure city residents – especially women, people of color and veterans – get equitable opportunities for jobs and careers from the project. The most critical stages are happening now. I urge NYSDOT Federal Highway Administration to reach an agreement on the goals being put forth, developed in cooperation with community stakeholders, for local hiring and to provide state and federal funds to train and prepare city workers throughout this multi-year project.

This letter shall provide detailed input from the City's perspective on the following topics (presented in alphabetical order):

- A. City Streets
- B. Community Parks/Facilities
- C. Community Impacts & Social Considerations
- D. Construction Duration, Phasing, and Mitigation
- E. Economic Impacts
- F. Emergency Services
- G. Geotechnical
- H. Lighting
- I. MLK School
- J. Noise
- K. Ownership and Maintenance Jurisdiction, Property Disposition
- L. Parking & Public Transit
- M. Pedestrian and Cycling Accommodations
- N. Public Art
- O. Stormwater/Sewage

- P. Takings
- Q. Traffic Signals
- R. Transportation
- S. Tree Planting, Landscape, and Environmental Enhancements
- T. Utilities Relocation
- U. Water Supply
- V. Wayfinding Signage

A. City Streets

1. Traffic Detour Wear and Tear on Pavement of City Streets

Page 4-29 indicates: "All other local streets were determined to have enough capacity, without any improvements, to accommodate the projected increases in traffic demand during construction." The City is concerned that increased traffic generated by detour routes will negatively impact the condition of local streets. The City acknowledges that improvements on the City street network have occurred; however, due to limits in funding, these repairs were limited and not as robust as preferred (e.g., utilizing mill and pave rather than full depth reconstruction). City streets used as detour routes will likely require surface treatment and/or restoration due to the impact of increased traffic wear.

We request that mitigation measures be taken to repair City streets that are negatively impacted by use as detour routes.

2. Clinton Street Conversion from One-Way to Two-Way Operation

Chapter 5, page 5-23 of the DEIS states that plans to convert portions of Clinton Street from a one-way to two-way operation will be implemented in approximately 2030, based on current plans. The City has plans to convert Clinton Street to a two-way operation south of Jefferson Street and has consulted with NYSDOT on conversion north of Jefferson Street, with the City agreeing not to proceed at this time.

We request that NYSDOT provide clarification as to the precise portions of Clinton Street that will be converted to a two-way operation and the timeframe for doing so.

3. Reconstruction Limits

Much of the State's proposed reconstruction covers only portions of blocks, stopping short of the closest cross street.

We request that the State provide consistent reconstruction of streets to the closest cross street as opposed to stopping mid-block as is shown on many streets. For example, the proposed reconstruction of Water Street is shown as stopping mid-block between Almond Street and Forman Street. Similarly, the reconstruction of Fayette Street is shown as stopping mid-block between Almond Street and McBride Street.

4. Intersection Level of Service

Section 5.6.1, pages 5-161 states that compared to the No Build Alternative, there will be fewer intersections operating at unacceptable levels (LOS E and F) under the Community Grid Alternative. Reduction would be from 11 intersections (No Build) to 3 (Community Grid). However, there will still be a

substandard level of service at three intersections in 2026 and one intersection in 2056.

We request that the DOT identify ways to improve levels of service and traffic flow at the three substandard intersections identified in this section: Comstock Avenue at Stratford Street (2026 am peak and 2056 pm peak); Teall Avenue at Erie Boulevard East (2026 pm peak) and Walnut Avenue at East Water Street (2026 pm peak).

B. Community Parks/Facilities

1. Community Engagement Regarding Wilson Park

Section 6.7, page 6-538 states that construction activities would increase noise, vibration, and dust at Wilson Park and would affect views of and from it, but these effects would be temporary. Part of Wilson Park would also be temporarily inaccessible due to construction. The stated impact to Wilson Park describes the construction activity as "temporary." However, due to the length of the construction schedule, the impacts must be regarded as more than merely temporary.

Although NYSDOT has stated its intention to repurpose part of the Wilson Park during construction and make improvements upon completion, we request that NYSDOT continue to work with the City Department of Parks Recreation and Youth Programs and the community to plan and construct new/alternative parks amenities (courts, fields, exercise areas, etc.). Although the impacts during construction are temporary, they will nevertheless impact the recreational and social activities of area residents who use Wilson Park for a significant amount of time. NYSDOT should work with the City and community to build new alternative parks.

2. Wilson Park Community Center and Pool Alternatives

Section 6-4-2 indicates that a portion of Wilson Park would be closed during construction, but that the community center and other portions of the park would remain open. The continuation of operations at the community center next to a construction site is not practical or safe. Additionally, the only pool available to this neighborhood will be unavailable during an extended construction period. The next closest pool, located at Kirk Park, is not within reasonable walking distance. Hot summers in Syracuse present an undue burden on children in this neighborhood without alternative options.

We request that the NYSDOT provide funding for a temporary neighborhood pool and alternative community center for the duration of the closure of those facilities due to construction.

3. Wilson Park Improvements

Appendix A-1, Part 2, Drawing GP-CG-H10-07 provides no context for any Wilson Park potential improvements and improvements to surrounding masonry, stone, and surfaces not specified.

The City Department of Parks, Recreation & Youth Programs requests to be considered as part of the staff support and planning team when determining the mitigation and development of Wilson Park. Understanding that plans are forthcoming, recreating a park that will last for generations while ensuring the highest quality of youth enrichment is essential to the goals for the future of Wilson Park. Any changes to Wilson Park should include adequate connections between shared-use paths and the park landscape and amenities. Objectives for the redevelopment of Wilson Park will provide for a planning process to establish a

park frontage to encourage and engage citizens to enjoy the park along a rebuilt Almond Street.

4. Wilson Park Soil

The State proposes in section 6-4-2 that Wilson Park be used as a site for equipment staging during construction. As a result, 20 feet of space within the east edge of Wilson Park will be heavily altered through high levels of soil compaction. Further, 0.12 acres of Wilson Park will be occupied for two years through a temporary easement, creating conditions with the potential to cause long-term soil and site drainage issues.

We request that the NYSDOT: (1) ensure all areas with soil impacted by construction activity, including areas accumulating large amounts of silt, sand and dust, are considered for additional mitigation; and (2) require that all compacted soils be tilled and amended by mixing organic matter into the top 3 feet of the topsoil.

5. Advance Notice of Restrictions/Closures of State and Local Trails

Section 6.4.2 indicates that there will be restrictions and/or closures of state and local trails without advance notification to relative departments within the City of Syracuse during the various phases of construction. These restrictions and closures will have designated and clearly marked detours on nearby local streets.

We request that the NYSDOT provide the City with advance notice of trail closures, estimated timeframes for reopening and communicate with City of Syracuse Parks staff, including the City Trails Coordinator, concerning alternative routes, detours, and mitigation planning.

6. Forman Park Inconsistencies

There are inconsistencies between Appendix A-1, Part 2 & Chapter 3, Figure 3-28 with respect to the proposed plan visualizations and DEIS-provided construction drawings.

We request that NYSDOT amend the proposed plan visualizations of Figure 3-28 to match Construction Drawing GP-CG-H10-12.

7. Forman Park Curb Radius

Appendix A-1, Part 2, Drawing GP-CG-H10-12 proposes curbing at the westbound corner of Genesee Street and northbound corner of the new Almond Street with a curb radius that is too tight for this location.

We request that the State increase the curb radius to one more appropriately suited for the park's location and level of use.

8. Landscape Area and Buffer Specifications

Appendix A-1, Part 2, Drawing GP-CG-H10-16A proposes landscape areas and buffers below bridge structures, between primary arterials, and along roadways that lack specifications for interactions with the surrounding area.

We request that all proposed landscaped areas and buffers be provided through a schedule and map to be shared with municipal stakeholders. Additionally, designs for any proposed and/or updated landscaped areas and buffers should consider surrounding area conditions including drainage, snow storage, nearby

utilities, traffic, recreation ability, ecology, and neighborhood context.

9. New Open Space & Rebuilt Traffic Islands

Appendix A-1, Part 2, Drawing GP-CG-H10-18A depicts new open spaces and rebuilt traffic islands.

We request that the NYSDOT ensure that all new open areas and rebuilt green spaces are adequately replanted and seeded with native grass seed and shrubs. Traffic island areas should be void of impervious surfaces that would negatively impact surrounding plant life and neighborhood character. All traffic island areas should also contain a mix of plantable structural soil and topsoil at a three-foot depth from surface to subgrade. In addition, the State should consider a redesign of the intersection of Hickory Street and Pearl Street. The proposed 90 degree turn from Pearl Street southbound to Hickory Street eastbound could create an adverse impact on winter-seasonal traffic through the accumulation of roadway snow. Adequate snow storage space should also be considered in this area.

10. City Hall Commons

Section 6-2-1.1.4 lists community buildings. *We request that this list be amended to include City Hall Commons.*

11. Oakwood Cemetery

Drawing No. GP-CG-H10-01, which relates to Oakwood Cemetery, does not adequately address the Oakwood Cemetery entrance. The construction of I-81 continues to have a profound negative impact on this nationally significant designed landscape. The construction of the highway embankment blocked the main entrance to the cemetery and eliminated direct access to the cemetery from the Southside neighborhood and from Downtown. In addition, the impact of noise pollution on the cemetery and the surrounding neighborhood has been significant.

We request that the State examine the original entrance and consider alternatives to restore the connection between this historic asset and the community. We further request that the State repair and stabilize the stone cemetery gate and introduce enhancements that improve the overall appearance along the Business 81/cemetery boundary.

C. Community Impacts & Social Considerations

1. Broad Effects on Social Groups

At section 6-2-2.4.2, page 6-74 and Table 4-7, page 4-40, the DEIS indicates that broad effects to social groups are not anticipated. While the DEIS gives consideration during construction regarding impacts on Loretto (proposed building of wall), there is nothing similar for Vinette Towers or other residential housing adjacent to the construction site.

We request that noise and air issues are appropriately recognized and mitigated throughout the construction area, for all impacted residents.

2. Air Quality Protection

Table 4-7, page 4-40 indicates that the NYSDOT will direct its contractor to schedule and conduct activities

and to employ appropriate protection techniques to minimize impacts to air quality and to protect sensitive receptors including schools, hospitals, etc. Statements in the report include the wording "when reasonable."

We request more information with respect to the enforcement of the proposed mitigation. Assuming these techniques are to be strictly enforced, the City requests that the NYSDOT implement penalties for breaches and remediation policies for impacted parties. The City further asks that the "when reasonable" language be stricken in favor of objective limits which are not subject to interpretation. With respect to the limits on means and methods between MLK and Harrison Street, the State should consider implementing similar limits at other locations along the proposed BL81 through downtown that would similarly be impacted by construction activity (e.g., residential apartments, health care facilities, hotel at Forman Park).

D. Construction Duration, Phasing, and Mitigation

1. Disruption of Summer Civic Events

Under Appendix A-1-7, Part 2, NYSDOT explains that Phases 2A1; 2A2; 2A3 will involve a detour of I-690 eastbound traffic through downtown Syracuse, and that the detour will run adjacent to Clinton Square and local streets. This extended detour of highway traffic along the Central Business District's primary plaza, festival and gathering space will increase vehicle and pedestrian risks. Potential shutdowns and detours of streets along Clinton Square or nearby may cause substantial disruption of summer civic events, including revenues generated through permitting by the City of Syracuse.

We request that NYSDOT modify its plans to employ appropriate safety measures to minimize impacts to spaces used for public events, including signage, detour notification, rehabilitation of affected areas, and reconstruction of safe and accessible crossings.

2. Work Zone Traffic Controls

We request that pedestrians, cyclists, and transit users be accommodated via direct routes, not blanket sidewalk closures and detours. Detours should only be employed as a last resort. Pedestrian sheds, physically protected diversions, and other solutions should be considered first.

3. Availability of Project Information

As outlined in 8-5 and section 8.1.2, the Community Grid alternative will take approximately six years to construct, which would involve closure of portions of I-81 and I-690 during various stages of construction. At these times, traffic would be routed to other highways or local streets. In section 4.5.2, the proposed public walk-in office is open only Monday through Friday from 9 a.m. to 5 p.m.

Considering the six year project duration, NYSDOT must be available to the City, residents, and other stakeholders for project information. This includes construction updates, upcoming closures, claims, general information, and coordination with property owners, among other issues. Establishing a field office (as proposed), a point of contact (or team), and a website/app to provide this information and access to the project is essential.

We request that NYSDOT also implement weekend and evening hours at its field office. In sections referencing use of media, we recommend specifying the need to engage media targeted to impacted

communities (e.g., Southside Stand, Urban CNY, Northside e-blast, etc.). The proposed phone line should include non-English services. Additionally, the Air Quality Control section of the DEIS must specify how notifications will be given to those affected when air quality safety limits are exceeded. Noise and vibration mitigations are listed as being employed "when reasonable." We further request more specific details concerning how reasonability is to be determined, especially given that construction is proposed to occur from 6:00 a.m. to 9:00 p.m. Be advised that the City's Construction Noise Ordinance Section 40-6 General Ordinances states that "No noise between 9:00 pm and 7:00 am Mon-Sat and no noise on Sunday and Holidays. This shall not apply to emergency work, and safety and protective devices."

E. Economic Impacts

1. Information Regarding Travel Delays and Impaired Access to Businesses

Construction of the Community Grid Alternative will require temporary lane and road closures. These closures will adversely impact local businesses by causing travel delays and impaired access to certain properties. Section 6-3-2 and Table 4-7 of the DEIS acknowledges that businesses in and near the project area will be adversely impacted. As mitigation, the DEIS states that the contractor will be directed to install temporary business signs to identify business entrances and to direct customers to businesses that would be affected by detours.

We request that, in addition to temporary signs and detour signs, information about how to access businesses be included in the App or Social Media Platform identified in the public engagement commitments section of Table 4-7.

2. Impacts of NYS&W Bridge Replacement and Track Relocation

Chapter 4, page 4-25 states that replacement of the NYS&W Railway bridge and relocation of the railroad tracks would occur in phases, with limited, short-term impacts to railroad operations. However, impacts to residences and businesses during this construction were not addressed in the DEIS.

We request that the DOT provide additional information concerning (1) how far railroad track upgrades will extend, (2) the extent of any impacts to the existing footprint of the railroad, and (3) any impacts to residences and businesses during these construction phases.

F. Emergency Services

1. Impact on Emergency Services

All of the projects listed in Figure 3.8.21 (in each phase) will impact our current emergency response model, especially as it relates to serious motor vehicle collisions on interstate highways. During each phase, additional manpower will be necessary for the fire department to continue to provide fire & emergency services safely and efficiently. Some areas of the City could be less accessible, especially in terms of specialty responses. Our hazardous materials unit, squad, and rescue companies have special equipment and skill sets that most fire companies do not. We will need to ensure that such resources will be equally available to all city neighborhoods at all times.

We request that the NYSDOT provide the City with funding for additional firefighters and equipment (in

strategic locations) during each phase of this project to ensure that emergency services are not critically disrupted.

2. Closed Fire Station on East Fayette Street

The disruption of I-690 and I-81 in the phases set forth in Section 4.3.1 will make impact emergency responses in certain areas of the City with the Syracuse Fire Department's current deployment model. Based on call data for the past several years, the area immediately east of the I-81 viaduct is one of our busiest response areas. While the I-81 viaduct is being removed and that portion of the community grid is being built, Fire Department resources will be impacted in the response area. This area was previously served by a fire station situated on East Fayette Street that ranked among the busiest fire stations in the United States. That station was closed in 2013. The other fire stations that now cover this response area will be impacted by the construction. To safely and efficiently serve this area of the City during the I-81 project, a fire station must be built and staffed in the vicinity of the closed station.

We request that the NYSDOT provide the City with funding for a fire station (and personnel) covering the area that becomes geographically isolated during the construction phase of the Project.

3. Opticom Traffic Preemption System

Page 5-141 and Appendix C-1 (Existing Traffic Control Devices) does not adequately address integration of Opticom traffic preemption systems with the Project. The Syracuse Fire Department utilizes the Opticom traffic preemption system to safely travel through busy intersections. There are 314 intersections in the city that utilize this system, including several in the area of the project. The community grid will make safe and efficient emergency travel through this part of the City impossible without traffic preemption capability.

In order to ensure safe and efficient emergency travel both during construction and after completion of the Project, we request that NYSDOT install Opticom systems at every new intersection the community grid creates or provide the City with funding for Opticom traffic preemption systems at all intersections created by the community grid.

4. Response Times

The City is concerned about potential response disruption created by this Project which could lengthen response times. Multiple neighborhoods may be negatively impacted by a delayed fire department response. Getting adequate resources to the census tracts in close proximity to the Project could take longer than usual. Currently, the Syracuse Fire Department has one of the best average response times in the state. Delayed responses result in poor patient outcomes during medical emergencies, and significant property damage during structure fires. Repeated major fires in neighborhoods will harm property values. An inability to bring an adequate amount of firefighting resources to a scene in a short period of time could also negatively impact our ISO class 1 PPC rating.

We request that the NYSDOT provide the City with funding for additional firefighters and equipment (in strategic locations) during each phase of this project to ensure that response times are not severely impacted.

5. Hazmat Response

In section 6-4-10.1 a HW/CM Assessment was completed for the Project Area, which identified over 250 sites of potential concern. The Syracuse Fire Department Hazardous Materials Response Team covers all of Onondaga, Oswego, and Madison counties. Any type of hazmat release/spill in the project area will require a response from the SFD team. These services are deployed City-wide, and may be particularly impacted by Project-related closures.

We request that the NYSDOT provide the City with funding for extra hazmat resources, or reimbursement for equipment and supplies used to mitigate any releases/spills.

6. Access to Camera Systems

Access to camera systems installed during the Project is not addressed in the DEIS.

We request that NYSDOT consider allowing the Syracuse Fire Department access to any camera systems the State may add to the new road system to enhance response time to traffic and accidents along the new routes or changed roadways.

7. Increased Police Department Costs

Based on our early examination of the 81 project, the SPD anticipates that its patrol and traffic units will need to address traffic enforcement and other traffic issues which will cause the department to dedicate approximately five hours a week involving a supervisor and four officers. The estimated annual cost would be approximately \$74,916 to \$93,660.

We request that the NYSDOT provide the City with funding to offset these increased costs associated with the Project.

G. Geotechnical

We believe that geotechnical abnormalities exist around the SU hill, possibly near the Renwick/Fineview area, including the possibility of infiltrating water in the ground and gypsum layers. These conditions may impact work in those areas and the proposed roundabout.

We request that the NYSDOT coordinate with the City Department of Engineering and other relevant municipal authorities regarding these conditions prior to undertaking work in these areas.

H. Lighting

1. Lighting District

Chapter 5, pages 5-181 states that, in general, NYSDOT will pay the cost of installing replacement light fixtures for existing lighting that is impacted by a state highway project, and the cost for maintenance would either be funded through a tariff rate with National Grid or through the City of Syracuse.

The City will need to review this impact as the lighting scheme will be in the NYSDOT right-of-way. Accordingly, the City may not be able to set up a lighting district due to the fact that the right-of-way does not belong to the City. If the lighting is somehow on City land then districts could be established and the adjoining property owners charged with a special assessment for the upkeep of the lighting. The City and

NYS DOT need to discuss this further.

2. Consideration of Lighting

In multiple sections of the DEIS, NYS DOT indicates that the final selection of site elements such as lighting will be determined during the final design.

Lighting is an important project element that must be considered prior to the final design stage of the Project. In addition to the appropriate lighting of vehicular travel lanes, pedestrian scale lighting must be included along sidewalks, bike lanes, under I-690, and in gathering areas like the Canal District, the Creekwalk, and the Lodi Street Overlook area, among others. Lighting should also be used at gateways into the downtown area. Different lighting will signal to vehicles entering the City that there are different driving conditions (e.g., slower speeds, more pedestrians and bicyclists, a street grid, etc.). This lighting cannot be the typical highway lighting used on the rest of I-81; it should be distinct and distinguishable to signal different conditions as users enter the downtown area.

Section 5.6 makes provisions for some lighting of pedestrian areas, bicycle lanes and shared-use paths, but the planned lighting does not appear to follow a consistent scheme.

We request that the State provide consistent lighting treatments for pedestrian, bicyclist, and shared use areas across project limits, including bridges, underpasses, and typical street sections.

3. Lighting During Construction and Demolition

The DEIS does not specifically address lighting during construction and demolition.

We request that the NYS DOT provide further information and that it comply with applicable City requirements and lighting installation policies.

I. **MLK School**

1. MLK Jr. East Roundabout

Section 3.4.3, and pages 3-33, 4-25, and 5-190 outline NYS DOT's proposal with respect to the MLK Jr. East Roundabout and the MLK School. The DEIS provides limited justification for the roundabout, but references that the new intersection would provide for free flow of traffic as well as enhance pedestrian and bicycle accommodation. During the public hearings, many concerns were voiced regarding the impacts of construction directly adjacent to MLK School. As noted in the DEIS, the proposed construction in this area will require two bridges to be removed as well as the removal of associated structural elements such as abutments and retaining walls. The proposed plan would also entail construction of a new railroad bridge.

The DEIS states in Table 4-7 that NYS DOT will "use saw cutting methods and prohibit impact hammers during the demo of existing structures when reasonable" and "direct contractor to use drilled foundations on all bridge piers and other support structures and prohibit pile driving method." However, noise impacts from the construction are still expected. Overall, the DEIS offers limited discussion regarding protection of the school facility during construction and contains no provision for an alternate school location during construction.

We request that NYSDOT extend the Almond Street Boulevard using slow speed boulevard treatments (narrow lanes, intersections, shared use path, median/ trees and other design elements) to an area south of MLK School and locate the roundabout in an area, at least, 600 feet from any school.

2. One-way bike lane on MLK Jr.

Chapter 5, page 185 references that one-way bike lanes would be provided on both sides of MLK Jr. East between Almond Street and Leon Street, but this statement is not reflected in the DOT's plans. The proposed roundabout at MLK/Almond (BL81) does not show bike lanes. *We request that the DEIS statement be revised for further clarification.*

3. Leon Street Sharrows + diagonal curb ramps

The DEIS proposes placement of sharrows on MLK at Leon Street, with the expectation that cyclists will dog-leg around the intersection to transition between the shared-use path and sharrow facilities. *We request that the DOT continue the shared use path to a more logical terminus area with bike facilities such as Salina Street or the Creekwalk.*

4. MLK Noise Barrier

Appendix A-1 part 2 of 2 indicates that a noise barrier will be installed on the south side of the MLK roundabout but not on the north side of the roundabout adjacent to MLK School. *We request that a noise barrier be installed adjacent to MLK School.*

J. Noise

1. Complaint Response Plan

Section 6-4-6, page 6-319 and Table 6-4-6-21 list six City streets/corridors which will be used as potential detour routes. The increased traffic will result in a perceptible noise level increase at noise sensitive receivers such as schools, hospitals, churches, and playgrounds. It will also have an adverse effect on some businesses and residents. *We request that the State develop a plan for reducing noise in these instances.*

2. Noise Insulation of Publicly Owned School Building

In Section 6-4-6, page 6-326, MLK School was not identified to be studied to determine if noise insulation is warranted.

Given the many concerns about I-81 being at grade near MLK, we request a noise study to determine the appropriate design of building sound insulation and noise barrier placement.

3. Noise Barrier Analysis & Alternatives

In Section 6-4-6, page 6-329, noise barriers were determined to be the most effective method of noise abatement. However, noise barriers were not considered feasible along the local streets in much of the Central Study Area of the project since openings for driveways would need to be provided for the residences and businesses, which would negate the effectiveness of the noise barrier. Therefore, no detailed evaluation of such barriers in the downtown area was conducted.

Because noise barriers were deemed not to be feasible in the downtown area, we request further studies concerning other methods of noise abatement.

K. Ownership and Maintenance Jurisdiction, Property Disposition

1. Disposition of surplus transportation right-of-way

Upon the completion of construction, NYSDOT could dispose of potential surplus transportation right-of-way in the Central Study Area in accordance with Federal and State law, or the Contractor may sell staging sites. At section 8.3, page 8-7 the DEIS states that NYSDOT will form a land use working group consisting of representatives from the city, the city's school district, economic development and economic opportunity organizations, the business community, environmental justice communities, neighborhood residents, and other organizations and stakeholders as appropriate to provide input to NYSDOT in establishing a framework for the non-transportation use of each potential surplus parcel.

This group must include the City, the school district, neighborhood representatives, environmental justice communities, economic opportunity and development organizations, and other stakeholders. Land use is a priority concern for the City and its residents, so there must be local control of decision making regarding surplus land. Formation of this group must begin at the start of construction, not at the conclusion of the project, as proposed by NYSDOT. Reuse and redevelopment of these potential sites should be focused on providing community benefits, which include economic development, recreation, and affordable housing among many others. These sites should meet these various needs based on their location, size, stakeholder input and feasibility.

2. Maintenance Responsibilities

Chapter 5, page 5-182 and Appendix C-6.5, Table C-6.5-1 reference what NYSDOT will own and take maintenance responsibility for with regard to the project roads. The DEIS references that NYSDOT and the City will continue to coordinate associated ownership and maintenance roles. It also directly states that a maintenance agreement with the City will be needed for maintenance of sidewalks and shared-use paths and to facilitate energizing and maintenance of any new lighting constructed along City streets as well as the State-owned lighting along I-81 and I-690 within the City limits.

The City is concerned that City costs/responsibilities to maintain sidewalks and shared-use paths and to facilitate energizing and maintenance of any new lighting will adversely impact the City budget and that maintenance fees under the current maintenance agreement are insufficient. NYSDOT has already determined that maintenance of the shared path will be assigned to the City similar to the Empire State Trail. Further discussion with NYSDOT is needed.

L. Parking & Public Transit

1. Removal of Viaduct Parking

At Table 8.1, 8-10, the DEIS indicates that parking under the existing viaduct would be removed and other lots would be affected. Impacts would be mitigated by replacing or creating parking lots beneath I-690 and by transportation demand management measures.

NYS DOT is requested to reestablish lost parking in an efficient manner that is safer, well-lit, more aesthetically pleasing, and in a manner that has less impervious surface than the current surface parking arrangement. These new parking facilities are also an opportunity to use lighting, public art, creative wayfinding, and other design features to enhance the otherwise uninspired views of parked cars.

2. Parking Meter Revenue from On-Street Parking

Chapter 5, page 5-176 states that there will be a net gain of approximately 575 public on-street parking spaces, as 147 on-street spaces will be lost but 722 spaces will be added. Similarly, in Appendix A-1, the State proposes several new parking areas in the City's Central Business District along new and reconstructed streets.

We request further clarification regarding whether the new on-street parking spaces will be metered and who will bear the responsibility for collecting parking meter fees. Some maintenance responsibility is being assigned to the City, but the City's maintenance fee has not been revised in many years. We request that fees from parking meters be allocated to the City to help compensate for City maintenance costs.

3. Parking Mitigation

The DEIS proposes construction of new surface parking lots and reinstallation of surface parking areas below I-690.

We request that these parking areas be garaged in consolidated facilities that meet mixed-use objectives set forth by the City in previous correspondence. Parking facilities should also be well integrated with pedestrian and bicycle facilities, offering bike parking and coordination with transit.

4. Transit Accommodations

Currently, the DEIS contains no substantive provisions concerning transit accommodations within the project area.

We request that the State coordinate with the City and Centro to provide transit shelters across the project area and create transit stops that meet existing Centro thresholds (within 25%) with respect to shelter boarding numbers. Additionally, we request that the State provide operational assistance for increased transit frequencies and/or Bus Rapid Transit across the project area as outlined by the MPO in previous reports.

M. Pedestrian and Cycling Accommodations

1. Intersection Conditions for Pedestrians and Cyclists

Sections 3.4.3 and 5.6 propose large intersections and a large number of travel lanes along Almond Street and other corridors. Intersections of this size do not address geometric and operation deficiencies for pedestrians and cyclists within the project limits. Intersections of this size will also require massive crossing spans for pedestrians, creating an environment that is just as, if not more hostile than the existing conditions for pedestrians and cyclists, especially for those traveling east/west who may have limited mobility.

We request NYSDOT consolidate through lanes and turning lanes and reduce the number of travel lanes for all Community Grid corridors to absolute minimums. Boulevard intersections along the Almond Street, Genesee Street, West Street, Adams Street, and Harrison Street corridors should have no more than four lanes.

2. Consistent Improvements to Pedestrian and Cyclist Accommodations

The DEIS proposes numerous investments to improve infrastructure and regional network connections for motor vehicles, but only provides scattered and isolated accommodations for pedestrians and bicyclists. To the extent that the DEIS contains improvements for infrastructure related to pedestrians and bicyclists, such improvements are treated as individual, non-typical, and disconnected pieces.

We request that the NYSDOT improve the consistency of pedestrian and bicycle accommodations throughout the project area and connect improvements to existing facilities wherever possible, including the Bear Trap Creek Bikeway, Creekwalk, Loop the Lake Trail, Empire State Trail, and Connective Corridor. To further improve upon the consistency of these accommodations, we ask that the NYSDOT expand upon planned improvements to the highway right-of-way and on local streets, such as by creating a connection to the landlocked overlook and shared-use path areas between Bear Street and Hiawatha Boulevard. We further request that NYSDOT provide a physically protected cycle track or shared-use path as a continuous feature from the northern project limit, roughly from the Regional Transportation Center, to the southern project limit on Colvin Street.

Similarly, we request that the NYSDOT provide physically protected bicycle tracks/shared-use paths across the bridges and approaching streets at Butternut Street, Spencer Street, Court Street, Brighton Avenue, and Glen Avenue. The sharrows currently proposed on a number of these streets are inappropriate for a project of this magnitude.

3. Consistent Sidewalk Design

The DEIS contains proposals for 5 foot wide sidewalks at a number of intersections along reconstructed and impacted portions of Genesee Street, Almond Street, Washington Street, Fayette Street, and others.

We request that the NYSDOT provide minimum 8 foot wide sidewalks with matching or similar snow storage buffers along all affected areas, as is typical for other areas of the project. We also request that NYSDOT increase the number of fixed vertical objects (such as bollards) on sidewalks throughout the project area to prevent vehicle access without obstructing pedestrian or bike travel.

4. Mid-block Crossing Safety Concerns

Under section 8.3, page 8-6, the DEIS proposes reconstruction of Almond Street with wider sidewalks, cycle tracks, shared-use paths, bumped-out curbs to reduce pedestrian crossing distance, and a median for pedestrian refuge. The proposed benefits of this reconstruction include improvement to mobility and accessibility for pedestrians and cyclists as compared to the No Build Alternative.

We request that NYSDOT consider alternatives for reducing mid-block crossing in dense, urban areas that do not incorporate a raised center median. In particular, alternative designs should be explored for the BL81 corridor south of Harrison Street. Despite incorporating multiple new signalized intersections, the likelihood

of mid-block crossings along the long blocks of this corridor continue to raise serious pedestrian safety concerns under the current plan.

5. Bear Street/Clinton Street Corridors

Currently, the proposed reconstruction of the Bear Street bridge and Bear Street corridor provides improvements for motorists but only incorporates sidewalk updates on the new bridge over BL81. Similarly, the DEIS proposes a reconstruction design for Clinton Street that only offers intermittent accommodations for pedestrians and bicyclists.

We request that the NYSDOT provide a physically protected cycle track/shared-use path along the entire Bear Street and Clinton Street corridors. These areas are critical thoroughfares for all modes of travel and intersect with the newly proposed SUP/overlook as well as the Creekwalk and many neighborhoods.

We further request that the Bear Street bridge over Onondaga Creek receive major aesthetic improvements accomplished through the reconstruction. This should include a shared-use path similar to Hiawatha Boulevard.

6. Almond Street Cyclist Accommodations

The DEIS proposes cyclist and pedestrian accommodations on Almond Street that present numerous safety concerns. The segment of Almond Street between Colvin Street and Burnet Avenue would force bicyclists to navigate unsafe dog-leg transitions and dismounts at high-volume intersections. The DEIS also proposes on-road bike lanes at the large and complex intersection of Almond Street and Genesee Street. *We request that NYSDOT utilize continuous physically separated cycle tracks or continuous physically separated bike lanes, wider crosswalks, and green MMA markings at crossings to allow cyclists a safer, protected crossing.*

7. MLK Jr. East Sharrows

We request that NYSDOT implement sharrows and a physically protected cyclist track/shared-use path on MLK past Leon Street to the project limit. To implement this improvement, NYSDOT should limit travel lane widths to 10 feet in this corridor or 11 feet if heavy truck and bus volumes justify wider lanes.

8. Harrison and Adams Street Accommodations

Under the current proposal, the DEIS only includes a cycle track for one block of the multi-block reconstruction of Harrison Street and no bicyclist accommodations on Adams Street.

We request that NYSDOT revise its proposal to provide a physically protected cycle track/shared use path for the entirety of the multi-block reconstruction of Harrison Street from Salina Street to Irving Avenue, and on Adams Street from Almond Street to State Street.

9. Erie Boulevard accommodations Sidewalks and parking adjustments

The DEIS includes the proposed construction of a physically protected cycle track/shared use path from Teall Avenue to Beech Street. *We request that the NYSDOT implement a similar design throughout the entirety of the reconstructed areas of Erie Boulevard between Crouse Avenue to Salina Street.*

10. ADA-Accessible Alternatives

Appendix A-1 of the DEIS indicates that the NYSDOT proposes to use diagonal curb ramps for pedestrian areas and varying pedestrian accommodations at driveways and curb-cuts, including crosswalks at various driveway locations.

We request that NYSDOT explore alternative designs that offer greater ADA accessibility. Diagonal curb ramps are not preferred by the City or the FHWA (Best Practices Design Guide) and should be used only as a last resort. Likewise, sidewalks should continue unbroken through all driveway openings with constant material and width. We request that the final EIS utilize no sidewalk designs which dip or require transitions, and instead incorporate aprons for all grade changes and utilize NYSDOT Type 2 driveways or similar.

11. Brighton Avenue Pedestrian and Cyclist Accommodations

The Brighton Avenue redesign proposed in Appendix A-1 of the DEIS includes curb and travel lane-adjacent pedestrian and bicyclist accommodations that fail to incorporate sufficient protections. *We propose that NYSDOT implement continuous fixed vertical objects such as pinned jersey barriers and bollards to prevent motor vehicles from mounting or entering designated pedestrian and bicyclist spaces. We also request that the NYSDOT continue pedestrian and cyclist accommodations to more logical terminuses to the north and south, from Lafayette Road to Thurber Street or Salina Street.*

12. Shared-Use Path Along Fineview

The DEIS proposes a new shared-use path along Fineview Place that terminates at Raynor Avenue. This proposed path travels along the rear of the Campus West apartments at a significantly lower elevation and with an unintuitive termination point.

We request that the NYSDOT redesign this path to interact with Syracuse University campus buildings in a more meaningful way by continuing the shared-use path to a more logical terminus such as Stadium Place or Campus Drive.

13. Cyclist Accommodations along Catherine Street

In the DEIS, NYSDOT proposes to reconstruct Catherine Street with on-road bike lanes. However, the proposed transition from separated cycle tracks to on-road facilities introduces unnecessary complexity to the curb line and road striping while providing significantly less safety to cyclists.

We request that the NYSDOT also install new curbing to restrict vehicle travel lanes to a width of 11 feet to protect cycle tracks on both sides of Catherine Street next to the sidewalks.

14. Cyclist Accommodations along Pearl Street

The DEIS does not incorporate cyclist accommodations along any of the new or rebuilt sections of Pearl Street. *We request that NYSDOT provide a physically separated cycle track or shared-use path along all new or rebuilt sections of Pearl Street with green MMA markings at crossings.*

15. Pedestrian and Cyclist Accommodations along James Street

The DEIS does not incorporate cyclist accommodations along James Street and proposes reduced sidewalk widths of 5 feet. *We request that NYSDOT provide a physically separated cycle track or shared-use path along all areas of the rebuilt James Street, green MMA markings at crossings, and sidewalks with a width of*

at least 8 feet and incorporated buffer and snow storage areas.

16. Warren Street and Other Areas

The DEIS proposes narrow sidewalks along Warren Street and other areas within the Central Business District, including areas where the sidewalk is adjacent to the curb. *We request that the NYSDOT ensure that all sidewalks throughout the Central Business District have a minimum width of 8 feet unless reasonable restricting factors are present. However, NYSDOT should ensure that curb adjacent sidewalks are no less than 8 feet in width wherever reasonably possible.*

17. Cyclist Parking Accommodations

Currently, the NYSDOT's proposal provides no parking accommodations for cyclists. *We request that the State provide staple-style racks along all new, rebuilt, or impacted areas. Two racks should be incorporated on each side of the street and located mid-block or at major destination points, and should total approximately four per block.*

N. Public Art

We request that pages 3-37, 3-38, 3-39, 3-40, 3-42 incorporate the use of public art as a gateway feature and consider using murals, lighting, sculpture, monuments, landscape features, etc. as a gateway feature into the City at various points, including: Clinton Street, Oswego Street, Crouse Avenue, Irving Avenue, MLK Jr, West Street, Van Buren Street, Lodi Overlook, and along the Almond Street corridor. We also request that the State incorporate opportunities for public art installations into the design of the Community Grid, especially at entrances into districts/neighborhoods and at key intersections. The State should engage local artists to design site elements including lighting, paving and wayfinding and incorporate art into the final design of structures including bridges, underpasses, retaining walls, sound barriers, etc.

O. Stormwater/Sewage

1. Condition of City Sewer System

Chapter 5, page 5-69 references the City's sanitary, storm and combined sewer system but does not mention the age or condition of sewers or the expected impact of construction activities on the City's aged infrastructure system, apart from mentioning required relocations due to conflicts.

We request that the NYSDOT coordinate with the City to identify sewer infrastructure that requires replacement or lining due to the age and condition of the system. NYSDOT must also clarify how it plans to apportion responsibility for repairing sewer breaks which occur during construction or as a result of construction.

2. Stormwater Runoff - Reduction in Impervious Surfaces

Chapter 5, page 5-197 states that the Community Grid will result in the removal of approximately 5 acres of road and highway pavement and lead to the creation of a number of "open areas" with stormwater runoff benefits, as depicted in Figure 5-46. Some of these locations are within the highway right-of-way.

We request NYSDOT clarify whether the 5 acres of new greenspace will be reserved as part of the NYSDOT's

reduction runoff plan or whether it can be repurposed for development subject to certain restrictions.

3. Onondaga Creek Stormwater Outfalls

In section 6-4-7.4.1, page 6-401 and page 5-196, the DEIS notes that detailed hydraulic analysis will be conducted during final design to demonstrate that project development will not result in adverse impacts to downstream watercourses. However, the DEIS does not specify certain details such as who will be responsible for maintaining the new sewer system or best management practices.

We request that NYSDOT base the hydraulic analysis on the existing conditions of the creek and its existing capacity (with sediment and existing conditions of creek channel walls, banks, etc.). NYSDOT should complete this analysis as soon as possible to verify that the system works. We also request that the NYSDOT demonstrate that there will be no adverse impacts to the creek including, but not limited to, erosion of soil and sediment along the creek bank and creek bed, change in creek capacity, and disruption of recreational use of the creek. NYSDOT must discuss maintenance of proposed facilities and best management practices with the City.

P. Takings

1. Increasing Land Preserved for Taxable Private Use

In Section 6-2-1.4.1 the DEIS states that one of the project's goals/outcomes is to "improve neighborhood cohesion [and] promote use of the street grid and the reconnection of streets." However, the proposal may in fact diminish neighborhood cohesion at the expense of the City's property values by excessively widening Almond Street, Irving Avenue, and South Crouse Avenue. In Section 6-3-1.4.1, NYSDOT rationalizes proposed takings by noting that many of the proposed locations are currently underutilized. However, to the contrary, that is more reason not to devote them to overbuilt infrastructure rather than productive use.

In order to return more State land to taxable private use, we request that the State narrow proposed lane widths, narrow proposed rights-of-way, and reduce proposed takings in street corridors. In order to maximize assessed value of existing and future parcels, we request that the State reconnect more streets with a goal of creating more high-value street frontage for parcels, and generally minimize amount of land given over to public infrastructure. We also request that the State reduce the amount of space devoted to public infrastructure, minimize the need for takings, and maintain or enhance the City's existing inventory of taxable real estate.

Q. Traffic Signals

1. Traffic Signal Coordination

At Table 8.1, page 8-921, the DEIS states that traffic signal coordination, signage, and pavement markings would be improved in the project area. These improvements include new signalized intersections and 41 signalized intersection replacements. No mention is made of traffic signal integration in the interim.

We request that all signals be built or rebuilt with full connection to the Traffic Management Center ("TMC"), thereby ensuring equipment can be part of the TMC interconnect system. Considering the significant re-establishment and re-connection of the City's street grid, NYSDOT must implement a comprehensive

traffic signal coordination evaluation and implementation throughout the project area, particularly in downtown Syracuse. This must go beyond the project limits and include the larger downtown traffic grid and adjacent neighborhoods.

2. Pedestrian Push Buttons and Signals

Section 5.6 provides that pedestrian push buttons and signals are to be installed “where feasible.”

We request that the State incorporate pedestrian signals (specifically, pedestrian countdown boxes) in any new or replaced traffic signal without compromise. All intersections are within an urbanized area and require pedestrian accommodations. Intersections designed without these features will be functionally obsolete and not accepted by the City of Syracuse.

R. Transportation

1. General Travel Lane Width and Speed Limit

Sections 3.4.3 & 5.6 indicate that the NYSDOT’s intent for the community grid appears to be to maintain its designation as a qualifying highway. This would allow STAA vehicles, including tractor trailer combinations greater than 65 feet, tractors with 28 foot tandem trailers, and 53 foot trailers to use that highway and any other highway street within one linear mile of the qualifying highway. The DEIS proposes a travel lane width of 12 feet for certain portions of the project area, where sections of the roadway would transition between a speed limit of 55 MPH and 30 MPH.

We request that the NYSDOT remove the qualifying highway designation from the Almond Street corridor to ensure the community grid is used as a network of city streets, not as a highway. NYSDOT should rework street widths to ensure that no travel lanes are wider than 11 feet for any street involved in this project and that the majority of streets conform to a preferred width of 10 feet. This is prudent, as a 12 foot travel lane does not support a 30 MPH design speed and is inappropriate in this context. We request that NYSDOT adopt a more appropriate roadway design with a 30 MPH maximum speed for all areas outside of the limited access highway.

2. Pavement Markings

Section 5.6 provides that new markings will be installed across the project area.

We request that the NYSDOT clarify that all new markings will be epoxy markings.

3. Intersections and Corner Radii

Appendix A-1 reflects varying corner radii at intersections, including some in excess of 35 feet.

We request that the NYSDOT revise its designs so that no corners or curbing at rebuilt intersections exceed 15 feet in corner radii pursuant to NACTO standards. We further request that, where exceptions to this dimension appear to be required, NYSDOT first explore and document other interventions that allow for wide turning vehicles rather than larger corner radii, such as striping and stop bar locations.

4. Speed Limit Adjustments BL 81

Signing travel lanes that were originally designed for Interstate 81, as well as new areas of roadway at 30 MPH, with 12 foot to 15 foot wide travel lanes is not acceptable.

We request NYSDOT rework street widths to ensure that no travel lanes are wider than 11 feet for any street involved in this project and that the majority of streets conform to a preferred width of 10 feet. This is prudent, as a 12 foot travel lane does not support a 30 MPH design speed and is inappropriate in this context.

5. Intersection design at Almond and Genesee

The DEIS proposal for the Almond and Genesee Street intersection includes a multi-lane intersection with multiple splitter islands, medians, and dedicated turning lanes. Under this proposal, NYSDOT would change the landscape of Forman Park and existing streetscapes to accommodate multi-lane intersection. This would fundamentally change the existing neighborhood gateway that was purposefully designed as part of the Connective Corridor project.

We request the NYSDOT reduce intersection complexity by (i) eliminating the Almond Street northbound and Genesee Street eastbound slip lanes and islands, (ii) combining turning and through lanes to reduce complexity, (iii) reducing travel lane widths to no greater than 11 feet, and (iv) reducing intersection complexity and size to limit the project's impact on the park space and existing streetscape.

6. BL81 Off Ramp and Oswego Boulevard Ext.

The DEIS indicates that NYSDOT proposes the BL81 off ramp and Oswego Boulevard Ext. contain multiple through lanes and wide travel lanes.

We request that the State consolidate through and turning lanes and make travel lanes no wider than 11 feet to force motorists to slow down and reduce high speeds to no greater than 30 MPH.

7. Hickory/Pearl Right Angle Curbing

The DEIS indicates that the Hickory/Pearl southbound travel lane is planned to operate as a turn-only lane with a right angle curb line.

We request that the State taper the curb line or utilize curvature at this location.

8. Alterations to Design of New and Rebuilt Sections of Clinton Street

The DEIS proposes that some portions of Clinton Street include sharrows, 13 foot wide vehicle travel lanes, and narrow sidewalks. We request that the NYSDOT provide minimum 8 foot wide sidewalks with matching or similar snow storage buffer along all areas, as is typical for other areas of the Project.

We also request that the State provide a physically separated cycle track or shared-use path along all areas of the new or rebuilt Clinton Street and provide green MMA markings at crossings.

9. Design and limits of rebuilt/impacted sections of Division Street West

The NYSDOT proposes to reconstruct portions of Division Street and stop its reconstruction mid-block. The portions where reconstruction is proposed will have narrow sidewalks.

We request that the State continue reconstruction to more logical terminus such as the closest intersecting street. Additionally, the State should provide 6 foot minimum sidewalks between Division Street and Solar Street.

S. Tree Planting, Landscape, and Environmental Enhancements

1. Maintenance Responsibility for Landscape Improvements

Section 5.6.4 of the DEIS contains no discussion on maintenance responsibility for landscape improvements.

We request that NYSDOT renegotiate its maintenance agreement with the City, given the significant lawn and tree plantings that are planned in connection with this project. The City's previous maintenance agreement is inadequate in light of current operation costs. We request that any future agreement be appropriately sized and include tree maintenance and grass in the cost estimates.

2. Design Standards Concerning Soils and Rooting Volume Per Tree

The DEIS indicates NYSDOT's proposal for extensive tree planting along the boulevard and all impacted intersections.

We request that NYSDOT provide clarification on design standards related to soil quality, condition and preparation prior to tree planting. The DEIS should be revised to incorporate soil amendment, soil replacement, minimum rooting volume per tree, and use of structural soils under sidewalks to minimize root and hardscape conflicts. All of these components are critical for ensuring success of trees. NYSDOT should consult with the City to implement design standards for soil quality and depth, soil amendment practices, minimum soil volume per tree, use of CU soil under sidewalks to mitigate root and hardscape conflict.

3. Species Palettes for Proposed Tree Planting

We request that the NYSDOT consult with the City regarding suitable species choices for proposed plantings along the boulevard and other impacted areas. The City will provide a species palette for NYSDOT designers to consider for the boulevard based on trees' tolerance to various site conditions, susceptibility of species to pests and disease and species diversity goals to minimize pest and disease impacts on the trees.

4. Buffer Plantings Adjacent to MLK School

The buffer proposed in Figure 3-38 and GP-CG-H10-03 is inadequate to address concerns touched on in Chapters 6-4-4 and 6-4-6.

We request NYSDOT increase the buffer width at this site and plant a 50% conifer mix—specifically Hemlock, Juniper, Northern White Cedar and White Pine. These species are shown to be the most effective at capturing and retaining particulate matter and the conifers will abate noise and air pollution in the winter. In comparison, deciduous trees will not be nearly as effective in the winter. We also request that NYSDOT build a service road to facilitate access and maintenance within the buffer. Additionally, NYSDOT should use a buffer planting mix distinctly different from the boulevard planting species list. Because these are grown in open soils farther from the road, NYSDOT should utilize an exclusively native planting mix at this site.

5. Boulevard (Allee) Tree Plantings

Figures 3-28, 3-29 and 3-41 plus GP-CG-H10-04 to GP-CG-H10-10 demonstrate the scale of planting proposed along the boulevard in areas which are currently low canopy, low income, tree equity areas in the City. While this mitigation of trees helps address that issue, soil quality, soil volumes per tree, and root conflicts with sidewalks are not addressed in the State's plans. These issues must be addressed so as to ensure trees reach the size proposed in concepts.

We propose (1) a minimum of 1050 cubic feet per tree (35' x 10' x 3' deep rooting area). This rooting volume will ensure trees reach maturity and allows for a 35 foot spacing between trees. This slightly closer spacing will discourage lower branching as the trees mature. (2) All tree lawns should have well drained (S-series) soils installed in a continuous trench to a 3 foot depth as the best mitigation for road salt is soil that drains well. Stone, concrete and debris on-site that is between sidewalk and curb after they are installed cannot be allowed to remain. Trees cannot grow in this substrate. (3) To simultaneously achieve soil volumes per tree and mitigate future sidewalk heaving from tree roots, CU structural soil should be installed along the entire length of the sidewalks to be lined with trees. This should be done everywhere in the community grid footprint to allow trees to reach the size proposed in the concepts. (4) To address stability concerns related to sidewalks of curb and sidewalk, CU structural soil can be installed in the tree lawn and under the sidewalk, then the top 18 inches may be removed in the tree lawn and replaced with S Series soil prior to planting.

6. Planting Palette for Boulevard Trees

We further request that the NYSDOT (1) minimize planting of Elm Allee plantings (perhaps to one block) as hybrid elms "resistant" to Dutch elm disease and elm yellows can still succumb to those diseases, and elms are also very prone to a variety of pest issues; and (2) break up oak plantings. The DEC Forest Health group does not recommend planting too many oaks adjacent to each other as roots graft and spread disease, which will be calamitous if oak wilt or sudden oak death appears in CNY.

We also recommend that the NYSDOT maximize diversity of boulevard plantings and have center lane plantings that are different from the east and west sides of the boulevard. The guide recommended urban trees produced by the Urban Horticulture Institute at Cornell should be used to determine which species have the necessary tolerances to urban conditions, especially soil pH, moisture tolerance and success in structural soils. The interventions proposed herein will result in very well-drained soils and the resource guide listed above will help guide designers.

T. Utilities Relocation

Chapter 5, page 5-204 and Appendix C-6 indicates that the cost to relocate all municipally owned utilities would be fully reimbursable. However, these sections of the DEIS do not address utilities that are not being relocated but may be impacted by construction activities due to the age and/or condition of the utility.

Due to the age and condition of City infrastructure, we request that replacement of utilities be considered beyond instances where relocation is required. Experience has shown that limited relocation and the connection to an existing aged system often results in failure at that location or just outside the new construction, resulting in re-work and/or costly repairs. Also, excavating near aging infrastructure can cause collapse or breaking of aging infrastructure during construction or shortly thereafter. There is a "Dig Once"

benefit with respect to replacing aging utilities which the NYSDOT should consider. The City cannot afford to replace all of the aging infrastructure impacted by this project within the project area without substantial economic hardship Water Supply.

U. Water Supply

1. Continuity of Water Supply

The NYSDOT does not provide discussion of water supply or temporary water supply in connection with the Project in Chapter 4 of the DEIS.

We request that the NYSDOT coordinate with the City to identify water infrastructure that requires replacement or lining due to the age and condition of the system and provide funding for replacement and/or improvement of this infrastructure. NYSDOT must also clarify how it plans to apportion responsibility for repairing water main breaks which occur during construction or as a result of construction. NYSDOT must also provide alternate water supply to impacted properties during any disruption greater than 24 hours in duration.

2. Brighton Avenue Bridge Water Mains

In its discussion of the Brighton Avenue bridge reconstruction, DEIS section 4.4.1 does not address how the existing water supply will be maintained along the bridge. Currently, there are two water supply mains located at the bridge—a 12" water supply main and a 24" water supply main.

We propose that the NYSDOT modify its Brighton Avenue bridge reconstruction plans to include replacement of the two water supply mains currently located at the bridge.

3. Hiawatha Boulevard Water Main

In DEIS Table C-6, NYSDOT makes no mention of the 24" water main on Hiawatha Boulevard. *We request that NYSDOT replace the main at this location.*

4. Incorrect Identification of Water Main Ownership in DEIS

Table 6-11-1 identifies several water mains as "OCWA" which are actually owned by City. *We request the NYSDOT work with the City Water Department to correct Table 6-11-1 and to create a plan for ensuring that water mains are replaced and in service before old mains are decommissioned.*

V. Wayfinding Signage

Considering the significant re-establishment and re-connection of the City's street grid, NYSDOT must develop a robust and comprehensive wayfinding program for all users. This includes vehicular wayfinding signage at gateways (Clinton, Oswego, Crouse, Irving, MLK Jr, West, Van Buren, Clinton, Bear, Almond St, etc.) and pedestrian and bicyclist wayfinding signage throughout the project in the City.

1. Wayfinding Signage as Part of Surplus Right-of-Way Redevelopment

Section 6-3-2 acknowledges potential opportunities to redevelop surplus rights-of-way and enhance the connectivity and walkability and bikeability of the re-established street grid.

We request that the NYSDOT consider implementing permanent wayfinding signs and maps, including digital kiosk style services, to help rebrand impacted neighborhoods and districts once construction is complete and direct pedestrians and cyclists who are using the re-established street grid to access business districts and amenities.

Conclusion

We thank NYSDOT for the opportunity to provide these comments. We have appreciated the Department's coordination with the City prior to the submission of these comments and look forward to continuing the City-DOT Working Groups on Infrastructure, Transportation, Planning, Public Safety and Public Information.

We have also greatly valued the way in which NYSDOT has embraced partnership with the City and local stakeholders in developing the SEP 14 local hiring application to the FHWA. With this collaboration, which began more than a year and half ago with the assistance of the Urban Jobs Task Force, the City of Syracuse and Onondaga County is positioned to be one of the first SEP 14 applications in the nation. We have the ability to demonstrate best practices and never before seen success in local hiring and in using major transportation projects to transform communities and people's lives.

Thank you for your work on this transformational opportunity for Syracuse, Central New York and the nation.

Sincerely,



Ben Walsh
Mayor